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California Business, Consumer Services and
Housing Agency

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(OAKLAND DIVISION)

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

No.: 4:22-MD-03047-YGR (PHK)

THIS DOCUMENT RELATES TO:

ALL CASES

**DECLARATION OF MARGARET R.
PRINZING IN SUPPORT OF CALIFORNIA
EXECUTIVE AGENCIES' MOTION TO
ENLARGE TIME FOR SUBSTANTIAL
COMPLETION**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

DECLARATION OF MARGARET R.
PRINZING IN SUPPORT OF
CALIFORNIA EXECUTIVE AGENCIES'
MOTION TO ENLARGE TIME FOR
SUBSTANTIAL COMPLETION

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MDL No. 3047
No. 4:22-MD-03047-YGR (PHK)

DECLARATION OF MARGARET R. PRINZING

I, Margaret R. Prinzing, declare under penalty of perjury as follows:

1. I am an attorney licensed to practice law in the State of California and am employed by the law firm of Olson Remcho, LLP. I serve as counsel for Nonparties the Office of the Governor of California, California Governor's Office of Business and Economic Development, California Department of Finance, California Department of Public Health, California Department of Consumer Affairs, California Office of Data and Innovation, and California Business, Consumer Services and Housing Agency (together, the "California Executive Agencies"). The facts set forth herein are personally known to me, and if called upon to testify, I could and would competently do so.

2. The reasons for the requested enlargement of time are set forth in the accompanying Declaration of J. Leah Castella.

3. On February 6, 2025, I participated in a conference call with Christopher Yeung, counsel for Meta. My colleague and I confirmed with Mr. Yeung that Meta agreed that the February 7, 2025, substantial completion deadline which applies to other California Executive Agencies does not apply to the California Governor's Office of Business and Economic Development ("GO-Biz"). Instead, Meta and GO-Biz will continue to meet and confer over the scope of a limited discovery response from GO-Biz. The deadline for that response remains to be determined as part of those meet and confer efforts.

4. We also explained to Mr. Yeung that other Executive Agencies would not be able to substantially complete document production by the February 7, 2025 deadline and so would instead move the Court to enlarge the deadline to February 21, 2025. We asked Mr. Yeung to inform us whether Meta would agree to the extension. We explained that we would in good faith attempt to address any concerns Meta had about any prejudice Meta might experience as a result of the request.

5. On February 7, 2025, Meta provided the following statement:

Meta is in discussions with the co-leads for the States about a global extension of deadlines that would include a global substantial completion deadline extension that accommodates the many States who have either

missed their deadlines or requested extensions. In light of those discussions – which we hope to conclude early next week – we do not think piecemeal extension requests are necessary. We are willing to grant the CA Executive Agencies a brief three-day extension of the substantial completion deadline to avoid the need for such piecemeal filings.

6. As nonparties to this lawsuit, the California Executive Agencies are not part of those discussions, which seem unlikely to conclude before the Agencies' current February 7 deadline passes. Because those discussions may ultimately be unsuccessful or result in an agreement that does not serve the interests and/or capacities of the California Executive Agencies, the Agencies believe it is necessary to continue pursuing the extension of time requested in this motion. If this requested extension of time is not granted, and the parties do not reach a global agreement extending the discovery deadlines, the California Executive Agencies will be substantially harmed by any consequences that might flow from their failure to comply with the current February 7, 2025 deadline, notwithstanding their extraordinary and good faith efforts to comply with that deadline, as set forth in the Declaration of J. Leah Castella.

7. On December 17, 2024, the California Executive Agencies submitted a court-ordered Joint Letter re Schedule for California Agencies' Document Production in which the California Executive Agencies identified February 14, 2025 as the anticipated substantial completion deadline for document production. ECF No. 1466. This was a good faith estimate based on the limited information then available to the parties, since the parties' meet and confer efforts over search terms were still underway. If granted, the Executive Agencies' request would have altered the previously set substantial compliance deadline of December 23, 2024, set by the Court. ECF No. 1380 (Discovery Management Order No. 12) at 2. On December 31, 2024, the Court entered an order setting the deadline for substantial completion on February 7, 2025. ECF No. 1495-1 at 2. Nonparty California Executive Agencies have not otherwise been involved in any previous time modifications in the case, whether by stipulation or court order.

8. The requested time modification would have limited effects on the schedule for the case. It would work no prejudice to Meta because the requested modified substantial completion

1 deadline, February 21, 2025, is consistent with the deadline for substantial completion in at least one
2 other state. On February 3, 2025, the Court continued the Kentucky Attorney General's time for
3 substantial production to February 21, 2025, the same date requested in this motion. ECF No. 1631.
4 Since granting this requested extension would be consistent with a previous Court order, it need not
5 disturb the deposition schedule in this case. When the Court extended Kentucky's substantial
6 completion to February 21, 2025, it set a deadline for Rule 30(b)(6) depositions of March 28, 2025,
7 unless otherwise agreed upon by the parties. ECF No. 1631. Here, the current deadline for 30(b)(6)
8 depositions is April 4, 2025. ECF No. 1495-1 at 2. Thus, even with the requested extension, the
9 current deposition schedule ordered by the Court still provides Meta sufficient time for depositions –
10 indeed, more time than what the Court recently ordered for Kentucky's depositions.

11 I declare under penalty of perjury that the foregoing is true and correct. Executed this
12 7th day of February, 2025, in Berkeley, California.

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14 /s/ Margaret R. Prinzing
Margaret R. Prinzing

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